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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**DECLARATION OF PATRICK  
SCHMIDT IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S NOTICE OF MOTION  
AND MOTION FOR ORDER TO SHOW  
CAUSE WHY DEFENDANTS SHOULD  
NOT BE HELD IN CONTEMPT OF THE  
PRELIMINARY INJUNCTION ORDER  
(Dkt. 426) AND EXPEDITED  
DISCOVERY ORDER (Dkt. 61)**

Date: July 27, 2017

Time: 8:00 a.m.

21 Ctrm: 8, 19th Floor

Judge: Honorable William H. Alsup

22 Trial Date: October 10, 2017

1 I, Patrick Schmidt, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt from  
7 Defendants’ Responses to Waymo’s First Set of Expedited Interrogatories Pursuant to Paragraph  
8 Six of the May 11, 2017 Preliminary Injunction Order (Nos. 1-9).

9 3. Attached hereto as Exhibit 2 is a true and correct copy of email correspondence  
10 between my office and counsel for Defendants spanning May 31, 2017 to June 1, 2017.

11 4. Attached hereto as Exhibit 3 is a true and correct copy of email correspondence  
12 between my office and counsel for Defendants spanning June 7, 2017 to June 14, 2017.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of two letters sent by  
14 Defendants and forwarded to my office on June 12, 2017.

15 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the  
16 transcript of the June 19, 2017 deposition of Lior Ron in this matter (cover page incorrectly reads  
17 “April 19”).

18 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the  
19 transcript of the June 19, 2017 deposition of Cameron Poetzsch in this matter.

20 8. Attached hereto as Exhibit 7 is a true and correct copy of email correspondence  
21 between my office and counsel for Defendants spanning May 31, 2017 to June 12, 2017.

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1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in  
3 Los Angeles, California, on June 21, 2017.

4  
5 DATED: June 21, 2017

/s/ Patrick Schmidt

Patrick Schmidt

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8  
9 **SIGNATURE ATTESTATION**

10 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
11 filing of this document has been obtained from Patrick Schmidt.

12  
13 /s/ Charles K. Verhoeven

Charles K. Verhoeven